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September 29, 1998

Tib Belza and Roger Strelow Co-Chairs, BDAC Water Transfer Work Group CALFED Bay-Delta Program 1416 Ninth Street, Ste 1155 Sacramento, CA 95814

Dear Tib and Roger:

This letter comments upon materials contained in the September 24 meeting packet for the BDAC Water Transfer Work Group. For your review we have also included a copy of the Authority's Water Transfer Policy Principles. These principles were revised this month to include a principle on the proposed water transfer clearinghouse. Issues that we think need further discussion include the following:

Draft Water Transfer Program Technical Appendix.

- 1. Page 3 of excerpt, last paragraph. The last sentence in this paragraph states that there generally is no reliable SWP or CVP conveyance capacity or Delta pumping capacity for transfers in other than dry years. We feel this statement is overly broad. Constraints on conveyance and pumping capacity are not uniform throughout the projects. That is, capacity may be available at certain times and in certain reaches in all years.
- 2. Page 4 of excerpt, List of Potential Solution Options. This list should be expanded to include improving the ability of agencies such as the SWRCB, DWR, SWP, CVP, and USBR to coordinate regulatory approvals and project scheduling in a timely fashion to optimize transfer opportunities.

Draft Stage 1 Water Transfer Actions – Water Transfer Framework.

- 1. Item 2, expand clearinghouse. We are concerned that the clearinghouse focus on collecting, assembling, and disseminating information to interested parties. The clearinghouse should not assume a regulatory, advisory, or advocacy role. (See enclosed Authority transfer principle 15.)
- 2. Item 7, rules for allocating wheeling and power costs. It is not clear how these rules would work. All proposed rules must comply with relevant state law.

If you have any questions or would like further explanation of our comments, please call me at 619-682-4153.

Sincerely,

Gordon A. Hess.

Director of Imported Water

cc: Greg Young

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